

REMARKS

In response to the Office Action mailed on October 6, 2004, Applicant respectfully requests reconsideration. Claim(s) 1-28 are now pending in this Application. Claims 1, 10, 11, 20-23 and 25-28 are independent claims and the remaining claims are dependent claims. In this Amendment, claim(s) 1, 10, 11, 20-23 and 25-28 have been amended; claim(s) 4 and 14 have been cancelled; and claims 29-32 have been added. Applicant believes that the claims as presented are in condition for allowance. A notice to this affect is respectfully requested.

Rejection under 35 U.S.C. §102(e) based on Moir, U.S. Publication No. 2001/0020956:

Claims 1-25 and 27 rejected under 35 U.S.C. §102(e) as being anticipated by Moir '956, U.S. Publication No. 2001/0020956 ('956). Applicant(s) respectfully disagree(s) with these contentions and assert that the present claimed invention is not anticipated by any disclosure in the Moir '956 reference.

Prior to discussing the specific features of applicant's claimed invention which distinguish the present claims from the Moir '956 reference, a brief discussion of the background may be appropriate. The present application describes a software toolkit for facilitating generation of a graphical user interface (GUI). As discussed in further detail in the specification, such a GUI is the predominant manner of command entry to a computer, and is typically performed via the well known Windows® operating system. Development of such a GUI tends to involve enumeration and placement of numerous display object, or icons, each suitable for input and output (I/O) functions. During, development, toolkits serve to assist developers by generating repeatable, frequently used segments of computer code to be executed in the resulting GUI. Such IO functions, once built into the resulting GUI, serve to provide active input from the user during runtime, or execution of the GUI and an application to which it

-22-

corresponds. In other words, during build time, developers employ such a toolkit for building software constructs into an application GUI, which at runtime, or execution, will receive and display I/O data items between a user by performing the functions of receiving and transmitting data and commands responsive to user input, or events.

In particular, the Office Action rejects independent claims 1, 10, 11, 20-23, 25 and 27 based on the assertion that Moir '956 discloses receiving a selection of at least one personality to assign to at least on the basic constructor objects (Office Action, page 2). Moir '956, however, does not show, teach, or disclose constructor objects and personality types as claimed according to the present invention. The Office Action seems to associate predetermined graphic parameters and user defined graphic parameters with the constructor objects and personalities, based on the paragraphs 35-38 cited by the office action. However, the constructor objects and personality types recited in the present claims are distinguishable from the Moir '956 disclosure, as now discussed in further detail.

Moir '956 discloses a system which provides a library of graphic display templates adapted for integration with predetermined and user defined graphic parameters, as disclosed at paragraphs 6, 11 and 12 on page 1. In contrast, the invention disclosed in the present application teaches a system and method for providing complex constructs in a graphical user interface (GUI), in which the complex constructs include associations to constructor objects, each having particular personalities appropriate to the output device at hand, as disclosed at page 15, line 24-page 16, line 8 of the specification as filed. Further, as discussed further below, the Moir system is operable at build, or compile time, while the present invention is operable at run time.

Therefore, the present application discloses a system which receives a selection of specific event handling functionality that is to be enabled for the personality in relation to a basic constructor object to which that personality is assigned, and further, receives a selection of specific view which that personality

-23-

provides to that basic constructor object when rendered on the graphical display of the computerized device, as described in previous claims 4 and 14.

Accordingly, claims 1 and 11 have been herein amended to include the subject matter of former claims 4 and 14, respectively, to now recite receiving a selection of specific event handling functionality that is to be enabled for that personality in relation to a basic constructor object to which that personality is assigned, and receiving a selection of specific view which that personality provides to that basic constructor object when rendered on the graphical display of the computerized device, to further clarify and distinguish the present invention. Further, claims 10, 20 and 25 have been similarly amended.

The Office Action suggests, at page 3 of the Office Action, that specific event handling functionality and the selection of a specific view formerly recited in claims 4 and 14 is disclosed by Moir '956 at paragraph 49. Moir '956, however, discloses prompting the user for passive input, for inclusion in the resulting graphic. The event handling and attributed personality refer to active input responsive to user actions during execution, or operation, of the resulting complex construct, as described at page 16, lines 9-28. The complex constructs recited in the present claims define active events completed by a user, rather than passive graphical displays, as disclosed by Moir '956. Therefore, the event handling recited in the present claims refers to RUN TIME behavior of the resulting complex construct, whilst the Moir '956 user entry occurs during BUILD TIME of the graphic for inclusion therein, as shown by the recreation of the typed name in the resulting graphic in the cited example. Accordingly, it is respectfully submitted that amended claims 1, 10, 11, 20, and 25 are now distinguishable over the prior art of record. Further, as the amended claims 1 and 11 include features of former dependent claims 4 and 14, respectively, it is further submitted that the subject matter of amended claims 1, 10, 11, 20, and 25 was within the scope of the previous search and therefore no new search is required.

Rejection of Claims 21-23 and 27 under 35 U.S.C. §102(e) based on Moir, U.S. Publication No. 2001/0020956:

The Office Action further rejects claims 21, 22 and 27 based on the suggestion that Moir '956 teaches the four disclosed constructor types for use in constructing a complex construct. For the reasons discussed above with respect to claims 1, 10, 11, 20 and 25, the claimed complex constructs differ from the cited templates and graphical parameters disclosed in Moir '956. Further, for the reasons discussed above with respect to claims 26 and 28, the claimed basic constructor types, specifically the button, dial, edit object, and container object which comprise the complex construct, are distinguishable from the Moir '956 templates for the reasons given above. Accordingly, claims 21, 22 and 27 have been similarly amended as claims 1, 10, 11, 20 and 25 to further clarify the present claims.

Claim 23, also enumerating the four basic constructs, has been similarly amended as claims 21, 22 and 27 and is therefore believed allowable for the reasons given above.

Rejection under 35 U.S.C. §103(a) based on Moir, U.S. Publication No. 2001/0020956:

Claim(s) 26 and 28 are rejected under **35 U.S.C. §103(a)** as being obvious over Moir '956, U.S. Publication No. 2001/0020956. The Office Action suggests that Moir '956 teaches functional characteristics at Page 2, paragraph 29 and at Page 1, paragraphs 6. Paragraph 29, however, merely recites a button as one possible use of the template, the other uses including a logo and a banner. As indicated above, such passive graphic displays are distinctly different than the active controls provided by the claimed functional characteristics. Further, Paragraph 6 merely recites graphic parameters, which are also merely passive displays based on the Moir '956 template.

Accordingly, one skilled in the art would not seek to modify a passive graphic parameter of the Moir '956 graphic template to achieve the dial alluded to

-25-

by the office action. Since the Moir '956 templates and parameters generate graphic displays for OUTPUT, and the claimed functional characteristics provide active INPUT, there is no teaching or suggestion in Moir '956 which would cause one to look to modify Moir '956 and achieve applicant's claimed invention.

Such functional characteristics, as discussed above with respect to claims 1, 10, 11, 20, and 25, are provided by the specific event handling functionality that is enabled for a particular personality, as discussed above and recited in amended claim 26. Accordingly, claims 26 and 28 has been similarly amended as claims 1, 10, 11, 20, and 25, to further clarify and distinguish applicant's claimed invention. Further, claim 26 has been further amended to recite that the complex construct is defined by a unified combination of the selected basic constructor objects and the corresponding selected personalities, as noted by the office action as lacking clarity, discussed at page 16, lines 608.

The Office Action further rejects claims 26 and 28 based on the suggestion that Moir '956 teaches a button object at Paragraph 2, discussed above. The Office Action further extends the button object to an edit object including a container object and a dial object. As discussed above with respect to claims 1, 10, 11, 20, and 25, the Moir '956 templates and parameters display passive output objects, and one skilled in the art would not look to modify Moir '956 to generate active (runtime) input provided by the claimed functional characteristics of the complex constructs. Therefore, there is no teaching or suggestion in Moir '956 of a selection of specific runtime event handling functionality, as recited in amended claims 26 and 28. Accordingly, claim 28 has been herein amended similarly to claims 1, 10, 11, 20 and 25, to further clarify and distinguish the invention defined by the present claims.

Added Claims:

The Office Action further suggests, at page 14, that applicant's previous submission does not describe the claimed complex construct as a unified component that is made of a set of objects. Accordingly, claims 29 and 30 have

-26-

been herein added to recite extended set of event listeners that are specific to the basic constructor objects to which those personalities are applicable combining, in the resultant complex construct, the selected basic constructor object and corresponding applicable personalities as a unified component operable for deployment in an executable software application, as discussed in the specification at page 16, lines 9-page 17, line 4 and page 20, lines 23-29. Further to claims 31 and 32 have been herein added to recite extended set of event listeners that are specific to the basic constructor objects to which those personalities are applicable, including subject matter from previously presented claims 7 and 17, respectively, to further clarify and distinguish applicant's claimed invention.

This active nature of the complex construct (and of the constituent basic constructs) is illustrated by the personalities attributed to each of the constructs, which allow responsive, event sensitive functional capabilities, as disclosed in the specification at page 20, lines 10-15. This active nature of the constructs, as defined in the claimed personalities and recited in original claims 7 and 17, distinguishes the present invention from the cited art of record. Accordingly, claims 31 and 32 have been herein added, reciting subject matter similar to original claims 7 and 17, to further clarify and distinguish the claimed invention.

If the U.S. Patent and Trademark Office deems a fee necessary, this fee may be charged to the account of the undersigned, Deposit Account No. 50-0901.

-27-

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 366-9600, in Westborough, Massachusetts.

Respectfully submitted,



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